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December 16, 2021

Via ECF

Honorable Steven I Locke  
United States District Court, Eastern District of New York  
100 Federal Plaza, Courtroom 1030  
Central Islip, New York 11722

Re: Patel et al v. Singh et al.  
Case No: 2:21-cv-00759-JS-SIL  
Joint Motion to Reopen Fact Discovery

Dear Judge Locke:

This firm represents Pratik Patel and Lalit Patel (“Plaintiffs”) in reference to the above-captioned lawsuit.

I am writing on behalf of all parties to respectfully request that the Court permit the reopening of fact discovery. Parties have conducted certain document discovery, but depositions from both sides remain outstanding.

This summer the undersigned has dealt with family health issues as well as subsequent illness of his own.

This is a first request for reopening of discovery deadline.

I have communicated with Defendants’ counsel and both parties are in agreement that the discovery deadline currently in place should be extended by 90 days. Accordingly, the parties jointly are respectfully requesting that fact discovery be reopened and extended by 90 days, with a pre-trial conference to be schedule on or about March 23, 2022

The parties are intending to hold depositions on February 16, 17, 18 and 25 respectively.

We thank the Court for its time and effort in consideration of this matter.

Respectfully yours,

/s/ Alexander Kadochnikov